

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

**IN RE WILMINGTON TRUST  
SECURITIES LITIGATION**

This document relates to: ALL ACTIONS

Master File No. 10-cv-00990-ER

(Securities Class Action)

Hon. Eduardo Robreno

ELECTRONICALLY FILED

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR (I) PRELIMINARY APPROVAL OF  
SETTLEMENTS AND (II) APPROVAL OF NOTICE TO THE CLASS**

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Dated May 25, 2018

Lead Plaintiffs and Class Representatives, the Merced County Employees' Retirement Association, the Coral Springs Police Pension Fund, the St. Petersburg Firefighters' Retirement System, the Pompano Beach General Employees Retirement System, and the Automotive Industries Pension Trust Fund (collectively, "Lead Plaintiffs"), hereby move this Court, pursuant to Federal Rule of Civil Procedure 23, for entry of an order: (i) preliminarily approving the proposed settlements resolving all claims asserted in this action (the "Settlements"); (ii) approving the form, content, and manner of giving notice of the proposed Settlements to Class Members; and (iii) scheduling a hearing to consider final approval of the Settlements, approval of the Plan of Allocation, and the motion by Lead Counsel for an award of attorneys' fees and reimbursement of Litigation Expenses.

This Motion is based upon the Stipulation and Agreement of Settlement with Wilmington Trust Defendants and Underwriter Defendants dated May 15, 2018, attached hereto as Exhibit 1; the Stipulation and Agreement of Settlement with KPMG dated May 25, 2018, attached hereto as Exhibit 2; the accompanying Brief; and all other papers and proceedings herein. The parties' agreed-upon form of proposed Preliminary Approval Order, with exhibits thereto, is attached as Exhibit 3 to this Motion. Pursuant to the terms of the Stipulations, this Motion is unopposed by Defendants.

Dated: May 25, 2018

Respectfully submitted,

**CHIMICLES & TIKELLIS LLP**

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